

1 Thomas A. Connelly (AZ Bar #019430)  
2 Robert T. Mills (AZ Bar #018853)  
3 Sean A. Woods (AZ Bar #028930)  
4 **MILLS + WOODS LAW PLLC**  
5 5055 North 12<sup>th</sup> Street, Suite 101  
6 Phoenix, Arizona 85014  
7 Telephone 480.999.4556  
8 docket@millsandwoods.com

9 DeeAn Gillespie Strub (AZ Bar #009987)  
10 Jenny D. Jansch (AZ Bar #024431)  
11 **GILLESPIE, SHIELDS & TAYLOR**  
12 7319 North 16<sup>th</sup> Street  
13 Phoenix, Arizona 85020  
14 Telephone: (602) 870-9700  
15 Fax: (602) 870-9783  
16 mailroom@gilllaw.com  
17 *Attorneys for Plaintiffs*

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Jessica Kahraman, *et al.*,  
Plaintiffs,

v.

State of Arizona, *et al.*,  
Defendants.

Case No.: 2:22-cv-00375-PHX-SRB

**CONSENT MOTION FOR  
EXTENSION OF TIME FOR  
PLAINTIFFS TO RESPOND TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT [DOC.  
216, 217]**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LRCiv 7.3(a), Plaintiffs make this consent motion for an enlargement of time to file and serve their response to *Defendants' Motion for Summary Judgment* [Doc. 216] and Defendants' Statement of Facts in Support of Motion for Summary Judgment [Doc. 217], both filed on 16 December 2024 (collectively, the "motion"). Plaintiffs make this request in good faith and not for purposes of delay.

The deposition of Plaintiffs' expert Timothy Turner was taken on 23 January 2025, and the certified transcript, which is part of the Response, was received from the court reporter on 11 February 2025. In addition, Plaintiffs' counsel has an appellate brief due on

1 18 February 2025 as well as an all-day mediation on 19 February 2025 in two unrelated  
2 matters. Finally, the spouse of co-counsel who is also working on the Response is having  
3 surgery on 18 February 2025.

4 Plaintiffs contend these set of circumstances present good cause justifying a brief  
5 extension of time to respond to the motion from 18 February 2025 until 21 February 2025.  
6 Defendants consent to the brief extension.

7 For all the above reasons, Plaintiffs respectfully request an extension of time until  
8 21 February 2025 to file their response to Defendants' motion for summary judgment.

9 A proposed Order is also submitted for the Court's consideration.

10  
11 RESPECTFULLY SUBMITTED this 17th day of February 2025.

12 **MILLS + WOODS LAW PLLC**

13 By /s/ Thomas A. Connelly

14 Thomas A. Connelly  
15 Robert T. Mills  
16 Sean A. Woods  
17 5055 North 12th Street, Suite 101  
18 Phoenix, AZ 85014

19 **GILLESPIE, SHIELDS & TAYLOR**

20 DeeAn Gillespie Strub  
21 Jenny D. Jansch  
22 7319 North 16<sup>th</sup> Street  
23 Phoenix, AZ 85020

24 *Attorneys for Plaintiffs*  
25  
26  
27  
28

MILLS + WOODS LAW, PLLC  
5055 North 12th Street, Suite 101  
Phoenix, AZ 85014  
480.999.4556

**CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2025, I electronically transmitted the foregoing document to be filed electronically with the Clerk's Office through the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be served on all counsel of record via the Court's CM/ECF system.

/s/ Thomas A. Connelly